

EXHIBIT B

From: Adam Slater <ASlater@mazieslater.com>
Sent: Thursday, December 17, 2020 5:36 PM
To: Priselac, Jessica; Christopher Geddis; Goldberg, Seth A.
Cc: Schwartz, Barbara; Hill, Coleen W.; Cheryll Calderon; lhilton@kanner-law.com; George T. Williamson; Ferretti, Joseph S.
Subject: Re: ZHP/Princeton/Solco Depositions Meet and Confer

Counsel:

Plaintiffs are writing to agree to schedule the depositions of the following witnesses per your email, with the length of the depositions to be subject to such issues as whether a translator is needed (we believe none of those listed below require a translator), the 30 b 6 topics to be addressed, and the size of the custodial and other relevant files to the subject matter of the depositions:

John Iozzia - January 20

Lijie Wang - January 26, please advise on 30 b 6 topics

Remonda Gergis - February 2

Hai Wang - February 16, please advise on 30 b 6 topics

With regard to Jun Du, we would appreciate earlier dates inasmuch as you are already targeting March for a number of important depositions, and Mr. Du is in New Jersey. We would also appreciate it if you could reconsider and designate Mr. Du on a 30 b 6 topic or topics since he is one of the easiest logistical depositions to conduct.

As to the balance of the deponents we really need to understand the topics they are being designated on, and the likely length of the depositions, for scheduling purposes.

We also will need to discuss the proposed loading of witnesses in March, as that puts us in a very difficult situation with regard to our expert reports. We need to address certain topics as early as possible, for example testing related topics, in order to advance our expert reports.

We look forward to speaking tomorrow.

Thank you,

Adam Slater

From: Priselac, Jessica
Sent: Thursday, December 17, 2020 11:41 AM
To: Christopher Geddis ; Goldberg, Seth A.
Cc: Schwartz, Barbara ; Hill, Coleen W. ; Adam Slater ; Cheryll Calderon ; lhilton@kanner-law.com ; George T. Williamson

; Ferretti, Joseph S.

Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Counsel,

As an initial matter, we are disappointed that you still have not addressed any of the scheduling issues we wrote about more than one week ago, despite the fact that you committed to do so during our meet and confer last week. It is imperative that we schedule the depositions we proposed below as soon as possible so that that our witnesses can hold their deposition date on their schedules, and so that we can coordinate the logistics for these depositions. This is especially true for our witnesses who are in China, who must make extraordinary efforts to travel to Hong Kong during the COVID-19 pandemic (assuming that they will even receive permission to travel to Hong Kong during the pandemic). Having received no response from you on our original proposal, some of our witnesses can no longer be deposed on the dates we originally proposed, and their updated availability is below.

Further, as the dates we proposed in January and February for the U.S. witnesses are quickly approaching, please select a date John Iozzia, Lijie Wang, Remonda Gergis, and Hai Wang by tomorrow so that our witnesses can release the other dates we offered. If you do not respond by tomorrow, we will assume you are available any of the dates we proposed for these witnesses and will choose one, and will let the witness know they can release the other dates.

No.	Witness	Party	30(b)(6)?	Available Dates	Locale
1.	John Iozzia	Huahai US	No	January 20-22	U.S.
2.	Lijie Wang	Prinston	Yes	January 26, 28, 29	U.S.
3.	Remonda Gergis	Prinston	No	February 2-4	U.S.
4.	Hai Wang	Solco	Yes	February 16,17,18	U.S.
5.	Jun Du	ZHP/ Prinston/ Huahai US	No	March 18-19	U.S.
6.	Jay (Jie) Wang	ZHP	Yes	March 4-5	Hong Kong
7.	Linda (Lihong) Lin	ZHP	Yes	March 2-3	Hong Kong
8.	Peng Dong	ZHP	Yes	March 30-31	Hong Kong
9.	Eric Gu	SynCores	Yes	March 9-10	Hong Kong
10.	Minli Zhang	ZHP	Yes	March 16-17	Hong Kong

11.	Qiangming Li	ZHP	Yes	March 24-25	Hong Kong
12.	Min Li	ZHP	Yes	March 31-April 1	Hong Kong
13.	Jucai Ge	ZHP	Yes	March 11-12	Hong Kong

As a point of clarification, for the witnesses located in China, the dates we are proposing are the dates in Hong Kong. For example, we have proposed March 2 for Linda Lin, which means her deposition would begin the morning of March 2 in Hong Kong, and the evening of March 1 in the United States.

As to your most recent email, it is unfortunate that we must consistently waste time correcting Plaintiffs' mischaracterizations in written communications, such as the one in your email regarding the ZHP entities' productions – to be clear, ZHP has complied with the Court's orders regarding document productions. To the extent you are now claiming our production is "incomplete" due to the fact Guillem Boixados' custodial file has not yet been produced in its entirety, I would remind you that we agreed to provide you his custodial files as a courtesy and the production of his files has not been ordered by the Court; you requested his files well after the Court's deadline for making such requests; and Plaintiffs agreed his files would be provided after Nov. 30.

With respect to the witnesses you have requested below, we are available tomorrow at 9:30 am for a meet and confer, at which time we expect you will be able to discuss why these witnesses are not duplicative of the witnesses we have previously offered. Please let us know if you are available at that time.

Best regards,

Jessica

Jessica Priselac
Attorney at Law

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From: Christopher Geddis
Sent: Thursday, December 17, 2020 9:39 AM
To: Priselac, Jessica ; Goldberg, Seth A.
Cc: Schwartz, Barbara ; Hill, Coleen W. ; Adam Slater ; Cheryll Calderon ; lhilton@kanner-law.com; George T. Williamson
Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Counsel,

We write in follow up to our most recent discussion regarding ZHP deponents. We look forward to receiving the additional information you are providing, including the list of 30(b)(6) topics each witness you identified as a corporate designee will address. Subject to that information, Plaintiffs' continuing review of the ZHP Defendants' production, which is not entirely complete at this time, and the right to add deponents based on the further review of the production, including for example custodian Guiollome Boixados, whose custodial file has not yet been produced in its entirety, Plaintiffs propose the below listed additional deponents:

- Yuelin Hu of API Quality Assurance,
- Yanfeng (Lucy) Liu of API Regulatory Affairs,
- Fengyang (Xavier) Tang of Market Development,
- Mi (Karen) Xu of Market Development,
- Eric Tsai of Prinbury,
- Xiaodi Guo of Huahai US and Princeton, and
- Baohua Chen.

Because Plaintiffs do not have Baohua Chen's custodial file, we request production of his custodial file in order to conduct his deposition.

If you do not agree to any of the above deponents, please advise and provide some times when you are available to meet and confer on the issue.

Best,
Chris

Christopher J. Geddis
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From: Priselac, Jessica
Sent: Tuesday, December 8, 2020 11:12 AM
To: Christopher Geddis ; Goldberg, Seth A.

Cc: Schwartz, Barbara ; Hill, Coleen W. ; Adam Slater ; Cheryll Calderon ; lhilton@kanner-law.com; George T. Williamson

Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Chris,

Subject to the parties reaching agreement on the length of 30(b)(6) testimony, or the Court issuing an order thereon, and subject to certain other requirements, such as a witness's right to invoke Chinese state secrecy and/or privacy rules, ZHP, Prinston, and Solco propose the following witnesses for individual and 30(b)(6) testimony, along with the dates of their availability and the locale in which they will be appearing for their deposition:

No.	Witness	Party	30(b)(6)?	Available Dates	Locale
1.	John Iozzia	Huahai US	No	January 20-22	U.S.
2.	Lijie Wang	Prinston	Yes	January 26, 28, 29	U.S.
3.	Remonda Gergis	Prinston	No	February 2-4	U.S.
4.	Hai Wang	Solco	Yes	February 16,17,18	U.S.
5.	Jun Du	ZHP/ Prinston/ Huahai US	No	March 10,11	U.S.
6.	Jay (Jie) Wang	ZHP	Yes	March 2-3	Hong Kong
7.	Linda (Lihong) Lin	ZHP	Yes	March 4-5	Hong Kong
8.	Peng Dong	ZHP	Yes	March 8-9	Hong Kong
9.	Eric Gu	SynCores	Yes	March 11-12	Hong Kong
10.	Minli Zhang	ZHP	Yes	March 16-17	Hong Kong
11.	Qiangming Li	ZHP	Yes	March 18-19	Hong Kong
12.	Min Li	ZHP	Yes	March 24-25	Hong Kong
13.	Jucai Ge	ZHP	Yes	March 31 – April 1	Hong Kong

We look forward to our meet and confer with you on this issue later today.

Best regards,

Jessica

Jessica Priselac
Attorney at Law

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Friday, December 4, 2020 5:11 PM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>
Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Seth,

3:00 pm ET on Tuesday works for Plaintiffs. Ahead of the call, please let us know via email some preliminaries, such as the identities of deponents, where they are located or where the depositions would take place (if not remote), available dates, etc. This will allow for a more productive meet and confer.

Thanks,
Chris

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Friday, December 4, 2020 11:33 AM
To: Christopher Geddis <CGeddis@mazieslater.com>
Cc: Priselac, Jessica <JPriselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>
Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Chris, we are available at 1:00 or 3:00 on Tuesday.

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Seth A. Goldberg
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From: Christopher Geddis <CGeddis@mazieslater.com>

Sent: Friday, December 4, 2020 10:56 AM

To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Cc: Priselac, Jessica <JPiselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; lhilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>

Subject: RE: ZHP/Prinston/Solco Depositions Meet and Confer

Seth,

Plaintiffs are available Tuesday at 2:00 pm ET. Does that work for you?

And going forward, please include Adam, Cheryll, Layne, and George on emails regarding the ZHP entities' depositions. Thanks.

Best,
Chris

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>

Sent: Thursday, December 3, 2020 3:51 PM

To: Christopher Geddis <CGeddis@mazieslater.com>

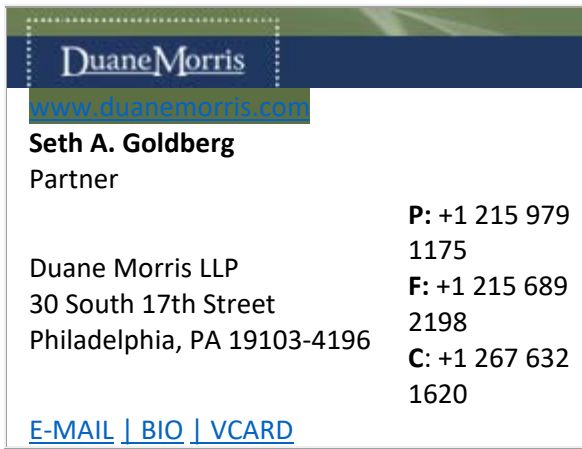
Cc: Priselac, Jessica <JPiselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: ZHP/Prinston/Solco Depositions Meet and Confer

Chris,

Please let us know if Monday at 1:00 works for you to discuss the ZHP/Prinston/Solco depositions.

Seth



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